

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2009-220-C

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| IN RE: Frontier Communications of the Carolinas, LLC – Extended Interruption in Service in Georgetown County <hr style="width: 30%; margin-left: 0;"/> |))))))) | South Carolina Office of Regulatory Staff's First and Continuing Request for Production of Books, Records and Other Information |
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TO: CHARLES L.A. TERRENI, ESQUIRE, ATTORNEY FOR FRONTIER COMMUNICATIONS OF THE CAROLINAS, LLC

The South Carolina Office of Regulatory Staff ("ORS") hereby requests, pursuant to S.C. Code Ann. § 58-4-55 (Supp. 2019) that Frontier Communications of the Carolinas, LLC ("Frontier" or the "Company") provide responses in writing and under oath and serve the undersigned by December 2, 2019, to ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201. If you are unable to respond to any of these requests, or parts thereof, in a timely manner specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these audit requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these audit requests, "address" means mailing address and business address. When asked to identify or provide a document, "identify" and "provide" mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a

copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this audit request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information shall be provided to ORS in the format requested.
- II. That all responses to the audit requests below be labeled using the same numbers as used herein.
- III. That if any information requested has been previously provided to ORS, then that information will be noted as such along with the manner, format, and date the information was provided.
- IV. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, that the information be reproduced and placed in the audit request in the appropriate numerical sequence.
- V. That any inquiries or communications relating to questions concerning clarification of the information requested below should be directed to Dawn Hipp [803.737.0814], Jeff Nelson [803.737.0823], Tom Allen [803.737.0974], or Kari Munn [803.737.0821] of ORS.
- VI. That this entire list of questions be reproduced and included in front of each set of responses.
- VII. That each question be reproduced and placed in front of the response provided.
- VIII. That unless otherwise specified the Company provide three (3) paper copies/binders of responses to ORS with numbered tabs between each question. In addition, it is requested that the Company provide one (1) electronic version of the responses.

- IX. That all exhibits be reduced or expanded to 8 ½" x 11" format, where practical.
- X. If the response to any audit request is that the information requested is not currently available, state when the information requested will be available and provided to the ORS. This statement is not a waiver of the deadline for all other responses.
- XI. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This audit request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.
- XIV. For every page produced to ORS that contains confidential information, the page be marked "CONFIDENTIAL" in the header.

REQUESTS:

SECTION 1.0 – GEORGETOWN SERVICE OUTAGE

- 1.1 Identify the Frontier Network Operations Center ("NOC") that supports and/or records network operations and conditions at the remote switch that failed (went out of service) on or about October 9, 2019 in the St. Luke area of Georgetown County, South Carolina ("Georgetown outage").
 - a) Explain how the NOC records network outages such as this one.
 - b) Provide copies of any and all Company reports generated to document the Georgetown outage or adverse event impacting basic local telephone service to customers in Georgetown County.
 - c) If this outage was not detected at the Frontier NOC, or by any other Frontier network monitoring devices, provide a detailed explanation as to why no record exists.
 - d) If no record of the outage exists, identify and explain how Frontier plans to monitor and report future network outages in South Carolina.
- 1.2 Provide a copy of any and all records related to customer complaints including, but not limited to, service calls, interruptions of service, trouble reports, and service quality reports received by Frontier from Georgetown County customers from September 9, 2019, to November 8, 2019.

- 1.3 Provide copies of any and all Company procedures to diagnose and/or escalate network outages.
- 1.4 Identify and explain any and all network outage diagnostic tools used by Frontier.
- 1.5 Provide copies of any and all Company practice, procedure, process and/or guide used by Frontier employees or contractors to escalate network outage information and recovery decisions.
- 1.6 Identify and provide the office location for any and all Frontier technicians/employees assigned to repair and maintain the Company's South Carolina service territory.
- 1.7 Provide a copy of any and all root cause analysis, after action report or other similar Frontier examination or investigation into the cause and recovery actions related to the Georgetown outage.
- 1.8 Provide all records, materials, communications, notes, emails, and text messages related to Frontier's response to the Georgetown outage and efforts to restore service.
- 1.9 Provide the account numbers, names, service addresses, mailing addresses, and telephone numbers of all Frontier customers affected by the Georgetown outage.
- 1.10 Provide a detailed listing of the service credits provided to the customers impacted by the Georgetown outage. Include the customer's name, service address, account number, amount of credit and date of credit.
 - a) Provide the calculation methodology used by the Company to calculate the amount of each credit.
 - b) Provide the aggregate amount of the credit provided to the customer impacted by the Georgetown outage.
- 1.11 Provide a detailed explanation of why the Company did not notify ORS or the Public Service Commission of South Carolina ("Commission") about the Georgetown outage.
- 1.12 Provide an explanation of any efforts made by Frontier to provide backup 9-1-1 service to the customers impacted by the Georgetown outage.
- 1.13 Provide a complete listing of all equipment that failed on or before October 9, 2019 which caused the Georgetown outage. Include equipment name, location of equipment, manufacturer, model numbers, serial numbers, and the date of installation.
- 1.14 Provide and explain Frontier's preventative maintenance schedule and activities for the equipment listed in Question 1.13.


- 1.15 Provide and explain the process used by Frontier to ensure backup equipment or replacement parts for failed equipment are available within a reasonable time period and/or within 24-48 hours of a network failure.
- a) Provide an explanation as to how the Company implemented the process to resolve the Georgetown outage. Explanation should include, but is not limited to, detailed description of Company actions including dates, times and employee names.
- 1.16 Provide the number of switches Frontier currently has deployed in South Carolina.
- a) Provide a listing of each central office switch, including address, the date the switch was placed in service, and describe the technology embedded in the switch.
 - b) Provide a listing of each remote switch, including address, the date the switch was placed in service, and describe the technology embedded in the switch.
 - c) Provide a listing of each IP switch, including address, and the date the switch was placed in service.
- 1.17 Provide the detailed recovery plans Frontier has in place for this type of network failure.
- a) Identify if these recovery plans were followed by Frontier in response to the Georgetown outage.
 - b) If these recovery plans were not followed by Frontier, explain why they were not followed.
- 1.18 Provide and explain any and all actions Frontier is or will initiate to correct maintenance and repair problems that contributed to the Georgetown outage within a reasonable time (within 24 to 48 hours).
- 1.19 Commission Order No. 2009-769 in Docket No. 2009-220-C was issued on October 29, 2009 under the condition of “a commitment by Frontier to resolve quality of service issues promptly, including repairing or upgrading the network as necessary.” Explain in detail how the Georgetown outage demonstrates the Company’s adherence to the requirements of Commission Order 2009-769.

SECTION 2.0 – SOUTH CAROLINA UNIVERSAL SERVICE FUND (“USF”)

- 2.1 Identify how payments received by Frontier from the USF are recorded by the Company on its books and records (for example: revenue or capital investment). Provide the general ledger account numbers to which these funds are recorded.

- 2.2 Identify and describe the timing of when the Company records payments from the USF, including a listing of dates the Company recorded payments from the USF in the calendar year 2018.
- 2.3 Provide and explain the Company's policies and procedures that determine how Frontier records any and all capital investments or expenditures used in telecommunications network expansion, upgrades, improvements/replacements, and operation and maintenance of those investments in South Carolina funded by or related to the receipt of USF support.
- 2.4 Provide and explain the Company's project monitoring system used to track USF-related capital telecommunications project expenditures and completion(s) in South Carolina.
- a) If a project monitoring system is used, provide a sample of the project monitoring to include screenshots or other supporting documentation.
 - b) If no project monitoring is used by the Company, provide a detailed explanation as to how the Company monitors the expenditure of USF.
- 2.5 Provide the transaction-level detail from the general ledger to support the Company's recording of:
- a) All funds received from the USF for the calendar years 2017, 2018 and 2019.
 - b) Expenditures of all funds received from the USF, including but not limited to, capital investments or expenditures used in telecommunications network expansion, upgrades, improvements/replacements, and operation and maintenance of those investments in South Carolina.
 - c) Provide a reconciliation of all transaction detail provided for USF funds received and expended to the general ledger.
- 2.6 Explain and describe, in detail, any and all future capital investments or expenditures for telecommunications network expansion, upgrades or improvements planned by the Company for the next five (5) years.
- a) Describe how these capital investments or expenditures for telecommunications network expansion, upgrades or improvements require USF support to be successful.
 - b) Explain if the Company expects to experience any increase in operating expenses associated with these capital investments or expenditures for telecommunications network expansion, upgrades or improvements.
If yes, identify, explain and provide an estimate of the amount of expense increase.
- 2.7 Does Frontier Communications of the Carolinas, LLC receive federal universal service support?

- a) If yes, provide the amounts received for the calendar years 2015, 2016, 2017, 2018 and 2019.
 - b) Explain and describe, in detail, the Company's past expenditures and intended future use of federal universal service support for each of these calendar years.
 - c) Provide a copy of any reports Frontier has provided to the Federal Communications Commission and/or the Universal Service Administrative Company supporting the appropriate use of these funds.
- 2.8 South Carolina Code § 58-9-280(E)(10) requires all carriers of last resort to retain records demonstrating that USF support was used for the programs for it was intended.
- a) For the period of January 1, 2018, to October 31, 2019, provide the records demonstrating that USF support was used in South Carolina for the programs for which it was intended.
 - b) Explain how Frontier used the USF received during the same time period.
 - c) Provide documentation supporting that the USF received was expended for programs provided in South Carolina during the same time period.



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November 8, 2019